

# Cooper & Kirk

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April 18, 2025

**Via ECF**

The Honorable Mark T. Pittman  
District Judge, The United States District  
Court for the Northern District of Texas  
501 West 10th Street, Room 310  
Fort Worth, Texas 76102

Re: ***Elite Precision Customs LLC v. Bureau of Alcohol, Tobacco, Firearms and Explosives,***  
**No. 4:25-cv-00044**

Dear Judge Pittman,

I am writing on behalf of all counsel in the above-captioned matter. This case presents a pre-enforcement challenge to a set of federal laws that ban the direct, in-person transfer of handguns to out of state residents. Plaintiffs seek to have these laws declared invalid and their enforcement enjoined.

Given the nature of the issues in dispute, all Parties agree that the case is not amenable to settlement at this time, barring changes to the Government's position following the Attorney General's review of the Government's position. *See* Defs. Mot. for an Ext. of Time, Doc. 23 (March 17, 2025). Counsel have conferred by phone and over email and are preparing a Joint Report requesting that the Court enter the following schedule to resolve this case quickly and efficiently:

- Defendants' Motion to Dismiss: May 5, 2025
- Plaintiffs' Opposition & Cross Motion for Summary Judgment: June 9, 2025
- Defendants' Response & Reply: July 14, 2025
- Plaintiffs' Reply: July 29, 2025

In view of the unlikelihood of resolution through settlement, and the fact that the Parties have agreed to the above schedule with respect to dispositive motions, the Parties respectfully request that the Court waive the requirement that the parties confer in person before April 25, 2025, and, upon filing of the Joint Report, enter the proposed briefing schedule. *See* Order, Doc. 26 (April 11, 2025).

Sincerely,

/s/ David H. Thompson  
David H. Thompson

*Counsel for Plaintiffs*